

EXHIBIT 3

EXPERT REPORT OF ALEX MARTINI

PJAM LLC v. XX Global, Inc., U.S.D.C. Central District Case No. 2:18-cv-03192 JFW (MRWx)

February 19, 2019

ALEX MARTINI

/S/ Alex Martini

1. Opinions

I intend to testify as a percipient witness at the trial of this matter but will also offer the following expert opinions regarding the revenue PJAM would have received on February 3, 2018 if defendant Jacques Webster/Travis Scott had shown up and performed at the Myth Live venue in Minnesota as contemplated in the January 24, 2018 contract at issue in this lawsuit:

- PJAM would have sold at least 2,000 general admission tickets at an average price of at least \$300, for a total of \$600,000.
- PJAM would have sold at least an average of \$50 worth of drinks to each of the 2,000 general admission entrants, for a total of \$100,000.
- PJAM would have sold at least 30 tables at an average price of \$5,000 per table, for a total of \$150,000.

2. Facts and Data Considered

As explained below, I have extensive national and international experience with concert, event and party promotion. This includes significant experience hosting high end parties at VIP destinations. I was intimately involved with the planning, management and marketing of the Super Bowl weekend event that included the event on Saturday February 3, 2018 event at which Travis Scott was to perform. This included analysis of the economics of high end Super Bowl weekend events (I also have previous experience with VIP Super Bowl events).

My opinions are in large part based upon my experiences as to what can be expected at a high end Super Bowl event at a venue like Myth Live which holds over 4,000 people. I have regularly been involved with events that have generated more than \$1 million in revenues in a particular night. I have seen many instances where tables sell for \$5,000, \$10,000 or \$30,000. In some instances, I have seen tables sell for more than \$100,000.

In addition to my experience and background as set forth below, I researched the revenues generated by another VIP event in Minnesota on the same night as Travis Scott was supposed to show up and perform at Myth Live. That event was hosted by Tao and, without a high end performer, generated more than \$300,000 just in ticket sales.

I also looked into what similar types of events – other than the ones I had hosted - had generated in revenues. In this regard, I consulted with counterclaim defendant Jefferson Agar, who assisted me in the preparation of our 2018 Super Bowl event. Mr. Agar works as the director of sales and VIP services at the Mirage in New York City. The Mirage is similar in size to Myth Live. Mr. Agar provided me with revenue data for a performance in 2018 by Drake, a high profile hip hop artist. That event generated over \$800,000 in revenues. Although New York City is a different market than Minnesota, the fact that our event was to be

held on the Saturday of the Super Bowl in Minnesota weekend makes this a reasonable comp.

I also researched how successful Travis Scott's performances have been. In particular, I noted that he sold out Madison Square Garden and performed at the halftime of this year's Super Bowl.

I also considered the fact that we generated more than \$100,000 in revenues at Myth Live the night before Travis Scott was to perform, with a lower profile act than Mr. Scott. Typically, the Saturday before a Super Bowl generates much larger revenues than the Friday night. This is because people tend to arrive on Friday and are less inclined to go out. Given Travis Scott's high profile status and the fact that he was to perform on Saturday, it is reasonable to expect that revenues would be many times higher than Friday. Also, between Mr. Scott and his booking agent, they were charging us \$235,000 for his performance. Implicit in the concept of demanding that type of fee is the fact that one can expect to generate much more than that in revenue.

3. Exhibits

Relevant exhibits are attached hereto.

4. Qualifications

I graduated from the University of Venice in Italy in 1993 with a degree in Economics. I then went on to study Economic History at Princeton from 1996 to

2000. For approximately 20 years, I have been involved in the entertainment and promotion business. I have particularly extensive experience in promoting and putting on shows, concerts, club openings and related events. I have put on events at VIP destinations throughout the world. These locations include New York City, the Hamptons, Las Vegas, Miami, Toronto, Montreal, Ibiza, Tulum, Acapulco, Mykonos, and many others. I often work with celebrity DJs such as Paul Oakenfold, Pete Tong, David Morales, Erick Morillo, Swedish House Mafia and Deep Dish. Although none of these DJs are as high profile as Travis Scott, their shows regularly generate extensive revenues similar to what I anticipated for the Travis Scott performance contemplated in this lawsuit.

Attached as Exhibit 1 is an overview of my work experience promoting events. I note that I have promoted events at many other venues beyond those that appear on this summary.

Attached as Exhibit 2 is a listing of noteworthy music festivals, events and large scale venues I have been associated with and high profile promoters/owners with whom I have worked.

It is routine for the venues and events listed on Exhibits 1 and 2 to generate hundreds of thousands of dollars – or more – in nightly revenue when they have high profile talent perform.

5. I have not testified in any other cases in the past five years.

6. I am not receiving any compensation for my report or testimony.

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EXHIBIT 1

YEAR	PARTY / VENUE	LOCATION	VENUE SIZE	ROLE	OWNER INFO	NOTABLE PERFORMERS / CELEBRITIES
2000	Space Hamptons Tavern	Southampton, NY Hamptons, NY	1,500 people 1,500 people	Promotional Director Promoter (Saturdays)	Michael Ruiz, 917-592-3068 Erik Von Brock, 917-553-0664	Lenny Kravitz Timo Maas, Danny Tenaglia, Dave Seaman Paris Hilton, Heather Graham, Rosario Dawson, Fairuza Balk
	Jet East	Hamptons, NY	700 people	Promoter (Fridays)	Andrew Sasson, 702-500-2880	
2001	Pangea NY Float	Manhattan Manhattan	300 people 1,500 people	Promoter (Tuesdays) Promoter	Michael Ault, 917-686-5436 Max Burgio (currently living abroad)	U2, Bono, Naomi Campbell, Kate Moss....
	Joe's Pub	Manhattan	800 people	Producer (Mondays)	Stuart Braunstein, 917-523-4980	Winona Ryder, Jimmy Fallon, Elizabeth Berkley
	Mint	Manhattan	1,200 people	Promoter (Saturdays)	Rob Vinokur, 917-587-7431	Lee Kalt, Mr. White
	Tavern	Hamptons, NY	1,500 people	Promoter (Saturdays)	Erik Von Brock, 917-553-0664	Timo Maas, Danny Tenaglia, Dave Seaman Paris Hilton, Heather Graham, Rosario Dawson, Fairuza Balk
	Jet East	Hamptons, NY	700 people	Promoter (Fridays)	Andrew Sasson, 702-500-2880	
2002	The Park Flow	Manhattan	250 people	Promoter (Thursdays)	Michael Ruiz, 917-592-3068	Demi Moore, Nicole Kidman, Kevin Huvain, Matt Dillon, Sarah Jessica Parker, Matthew Broderick
		Manhattan	700 people	Promotional Director	Ronnie Rivellini, 917-805-8184	Dean Winters, Vanjee, Mo Vaughn
2003	Crobar Eugene	Manhattan	2,500 people	Promoter	Rob Vinokur, 917-587-7431	David Morales, Roger Sanchez, Pete Tong, Paul Oakenfold, Danny Tenaglia, Deep Dish
		Manhattan	1,500 people	Promotional Director	Noel Ashman, 917-407-0626	Tara Reid, Michael James, Ronnie Madra
2004	Pink Elephant Pacha	Manhattan Ibiza	5,000 people	Promotional Director Promoter (Wednesdays)	Shawn Kolodny, 917-601-2660 Roman Fortunato, +34 666-724-102	Britney Spears, Mike Tyson, Erik Morillo Erik Morillo / Subliminal Sessions
	Star Room	Hamptons, NY	1,500 people	Promoter (Saturdays)	Michael Ruiz, 917-592-3068	Butch Ural, Richie Akiva, Puff Daddy, Russell Simmons,
2005	Quo Cain	Manhattan	1,400 people	Promoter (Fridays)	Walter Kim, 917-699-9952	Underground Club
		Manhattan	500 people	Promoter (Wednesdays)	Jayma Cardoso, 917-375-6624	VIP Club (too many to list)
2006	Home / Guesthouse	Manhattan	700 people	Promotional Director	Jon Bakshish, 917-553-3111	Dean Winters, Alex Sapir
	Star Room Cain Mokai	Hamptons, NY	1,500 people	Promoter (Saturdays)	Michael Ruiz, 917-592-3068	Butch Ural, Richie Akiva, Puff Daddy, Russell Simmons,
		Hamptons, NY	600 people	Promoter (Fridays)	Jayma Cardoso, 917-375-6624	VIP Club (too many to list)
		Miami, FL	800 people	WMC Promoter	Karim El-masr, 305-490-6965	VIP Club (too many to list)
2008	Kiss & Fly Mansion	Manhattan	1,200 people	Promotional Director	David Graziano, currently living abroad	Rony Seikaly... all top DJs in techno
	RDV	Manhattan	2,800 people	Promoter (Fridays)	Dirk Van Stockum, 917-622-6929	Large Scale Venue (GA ticket)
	Buddha Bar	Manhattan	250 people 1,500 people	Promoter Producer	David Graziano, currently living abroad Yura Shabatayev, 646-996-7301	VIP Club (too many to list) Behrouz, Rony Seikaly, Isaiah Martin
2009	Pacha NY	Manhattan	2,300 people	Promoter	Rob Fernandez (deceased)	Large Scale Venue (GA Ticket)
	21 Water	Hamptons, NY	1,500 people	Promoter	Joe Tuosto, currently living abroad	VIP Club (too many to list)
	Marquee	Manhattan	1,200 people	Promoter (Thursdays)	Yura Shabatayev, 646-996-7301	
2010	WIP	Manhattan	700 people	Promoter	Ronnie Rivellini, 917-805-8184	Underground Club
	Pink Elephant	Playa Del Carmen, Mexico	1,200 people	Producer	Pepe Escalante, +52 984 593 1748	Large Scale Venue

EXHIBIT 1

2011	1OAK	Manhattan	300 people	Promoter	Ronnie Madra, 917-847-0718	VIP Club (too many to list)
	BPM Festival	Playa Del Carmen, Mexico	20,000 people	Host	Craig Pettigrew, 646-717-3218	Large Scale Festival
	The Wall	Miami, FL	500 people	WMC VIP Host	Nicola Gioia, 786-554-8098	VIP Club (too many to list)
2012	Electric Daisy Festival	Rutherford, NJ	30,000 people	Host	Rob Fernandez (deceased)	Large Scale Festival
	Playroom Events	Mexico, NY, Ibiza	1,000+ people	Producer	Yura Shabatayev, 646-996-7301	VIP Events Worldwide
	Provacateur	New York, Dubai	500 people	Host	Brian Geffer, 917-414-6166	Swedish House Mafia, Tiesto, Avicii, Deadmau5, Afrojack
2013	Sankeys NY	Manhattan	1,500 people	Director	Dirk Van Stockum, 917-622-6929	Underground Club
	BPM Festival	Mexico	20,000 people	Host	Craig Pettigrew, 646-717-3218	Large Scale Festival
2014	Space NY	Manhattan	2,000 people	Director	Dirk Van Stockum, 917-622-6929	Large Scale Club (GA)
2015 - Present	Playroom Events	Worldwide	1,000+ people	Producer	Yura Shabatayev, 646-996-7301	VIP Events Worldwide

EXHIBIT 2

Music Festivals

Collectively millions of tickets sold over the year

- The Bpm Festival
- Electric Daisy Carnival NY
- Ultra Miami
- UR1
- Electric Field Philadelphia

US Based venues / events

*some of these venues don't exist anymore or have changed name

- 1Oak NY
- Lotus, NY
- Mokai, Miami
- Mansion NY
- Crobar NY
- Crobar, Miami
- Tao, NY
- Lavo, NY
- Marquee, NY
- Hakkasan, Las Vegas
- Mirage NY
- City Fox experience, NY
- Life, NY
- Float, NY
- Tavern, Hamptons, NY
- Star Room, Hamptons
- Jet East, Hamptons
- Cain, NY
- Cain, Hamptons
- Guesthouse, NY
- Pink Elephant, NY
- Quo, NY
- Sankeys, NY
- Space, NY

International Large Scale Venues / Events

- Ushuaia Ibiza, Spain
- Cavo Paradiso, Mykonos, Greece
- Peter Pan, Riccione, Italy
- Palladium, Acapulco, Mexico
- Sound, Tulum, Mexico
- Omnia, Bali, Indonesia
- Pacha, Ibiza, Spain
- Amnesia, Ibiza, Spain
- Maison, Toronto
- Space, Ibiza

Selected References:

These are the biggest names in nightlife industry

Ronnie Madra

Chief Marketing Officer Butter Group / Co-Owner of 1Oak

Mark Baker,

Legendary club owner in NY (Lotus, Life...)

Now Club Omnia Bali

Pavan Pardasani

Chief Marketing Officer – Tao Group

Karim Masri

Co-owner KNR Hospitality Group

The Wall, Miami

PROOF OF SERVICE

I, MONICA MAKIYAMA declare:

I am a resident of the state of California and over the age of eighteen years, and not a party to the within action; my business address is Hill, Farrer & Burrill LLP, One California Plaza, 37th Floor, 300 South Grand Avenue, Los Angeles, California 90071-3147. On February 19, 2019, I served true copies of the following document(s) described below on the interested parties as follows:

**SUPPLEMENTAL EXPERT REPORT OF
ALEX MARTINI DATED FEBRUARY 19, 2019**



BY CM/ECF NOTICE OF ELECTRONIC FILING: I

electronically filed the document(s) with the Clerk of the court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.



by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.



by electronic mail: I transmitted a true copy of such document(s) described above, via electronic mail to: see attached service list below.

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I declare under penalty of perjury under the laws of the United States of America California that the above is true and correct and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on February 19, 2019, at Los Angeles, California.


MONICA MAKIYAMA